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Attorneys for Debtors and Reorganized Debtors

UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the lead case,
No. 19-30088 (DM)*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**STIPULATION EXTENDING TIME FOR
FEDERAL AND STATE AGENCIES TO
RESPOND TO REORGANIZED
DEBTORS' MOTION TO APPROVE ADR
AND RELATED PROCEDURES FOR
RESOLVING GENERAL CLAIMS**

[No Hearing Requested]

1 This stipulation and agreement for order (“**Stipulation and Agreement for Order**”) is
2 entered into by PG&E Corporation and Pacific Gas and Electric Company (collectively, the
3 “**Debtors**” or “**Reorganized Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter**
4 **11 Cases**”), and the following federal and state agencies: United States Department of the
5 Interior; United States Department of Agriculture; Environmental Protection Agency; United
6 States Nuclear Regulatory Commission; California Department of Toxic Substances Control;
7 California Department of Parks and Recreation; California Department of Fish and Wildlife;
8 California Regional Water Quality Control Boards; California State Water Resources Control
9 Board; California Air Resources Board; California Department of Water Resources, by and
10 through its California Energy Resources Scheduling Division and on behalf of the State Water
11 Project; California Department of Conservation, California Geologic Energy Management
12 Division (formerly the Division of Oil, Gas and Geothermal Resources); San Francisco Bay
13 Conservation and Development Commission; and California Coastal Commission, (collectively,
14 the “**Federal and State Agencies**”). The Reorganized Debtors and the Federal and State
15 Agencies are referred to in this Stipulation and Agreement for Order collectively as the
16 “**Parties**,” and each as a “**Party**.” The Parties hereby stipulate and agree as follows:

17 **RECITALS**

18 A. On September 1, 2020, the Reorganized Debtors filed a *Motion to Approve ADR*
19 *and Related Procedures for Resolving General Claims* [Dkt. No. 8970] (the “**Motion**”).

20 B. Any oppositions or responses to the Motion are due to be filed with the
21 Bankruptcy Court and served on counsel for the Reorganized Debtors by 4:00 p.m. (Pacific
22 Time) on September 15, 2020.

23 C. The Parties are discussing and attempting to resolve issues raised by the Federal
24 and State Agencies with regard to the Motion. The Parties have agreed to extend the deadline for
25 the Federal and State Agencies to file and serve any oppositions or responses to the Motion to
26 4:00 p.m. (Pacific Time) on September 18, 2020, while the Parties continue such discussions.

1 **NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE**
2 **INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS**
3 **STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH THE**
4 **UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE COURT TO ORDER,**
5 **THAT:**

6 1. The time for the Federal and State Agencies to file and serve any oppositions or
7 responses to the Motion is extended through 4:00 p.m. (Pacific Time) on September 18, 2020.

8 2. This Stipulation shall constitute the entire agreement and understanding of the
9 parties relating to the subject matter hereof and shall supersede all prior agreements and
10 understandings relating to the subject matter hereof.

11 3. This Stipulation may be executed in counterparts, each of which shall be deemed
12 an original but all of which together shall constitute one and the same agreement.

13 4. The Bankruptcy Court shall retain jurisdiction to resolve any disputes or
14 controversies arising from this Stipulation.
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1 Dated: September 15, 2020

2 WEIL, GOTSHAL & MANGES LLP
3 KELLER BENVENUTTI KIM LLP

4 /s/ Tobias S. Keller
5 Tobias S. Keller

6 *Attorneys for Debtors*
7 *and Reorganized Debtors*

Dated: September 15, 2020

FELDERSTEIN FITZGERALD
WILLOUGHBY PASCUZZI & RIOS LLP

/s/ Paul J Pascuzzi
Paul J. Pascuzzi

*Attorneys for California Department of
Toxic Substances Control; California
Department of Parks and Recreation;
California Department of Fish and
Wildlife; California Regional Water
Quality Control Boards; California State
Water Resources Control Board;
California Air Resources Board;
California Department of Water
Resources, by and through its California
Energy Resources Scheduling Division and
on behalf of the State Water Project;
California Department of Conservation,
California Geologic Energy Management
Division (formerly the Division of Oil, Gas
and Geothermal Resources); San
Francisco Bay Conservation and
Development Commission; and California
Coastal Commission*

16 Dated: September 15, 2020

17 UNITED STATES DEPARTMENT OF
18 JUSTICE

18 /s/ Matthew Troy
19 Matthew Troy
20 Karl Fingerhood

21 *Attorneys for Federal Agencies*